



ALTERNATIVE TO THE “ALL OR NOTHING APPROACH”:  
**CONTINUED DISCUSSION  
ON PARTIAL CREDIT**

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# WHY ARE WE DISCUSSING PARTIAL CREDIT?

- It is directly referenced in our Management Board Charge:

## **ISSUE V. Alternatives to “All or Nothing” Approach to BMP (Re)verification**

- **Can there be gradual or partial credit over a period of time** as opposed to zero credit for those BMPs that cannot be verified? Perhaps there’s room for a compromise that’s acceptable (particularly for those BMPs that are Natural Resources Conservation Service (NRCS) practices).
- Three jurisdictions have submitted proposals to consider.
- As a group, we are attempting to **develop solutions** to state’s verification challenges.

# WHAT IS THE PURPOSE OF PARTIAL CREDIT?

- To alleviate the challenge of verifying practices that cannot be located (or cannot be verified in general).
  - *There is room to discuss this applying to only certain BMPs.*
- This is a **policy** driven discussion.



## **An Example of What Partial Credit Could Be:**

The Gradual Phase Out Approach

# PROPOSALS

## THE GRADUAL PHASE OUT APPROACH

### Why?

- **There is a likelihood of a BMP Continuing to Function after its first Credit Duration.**

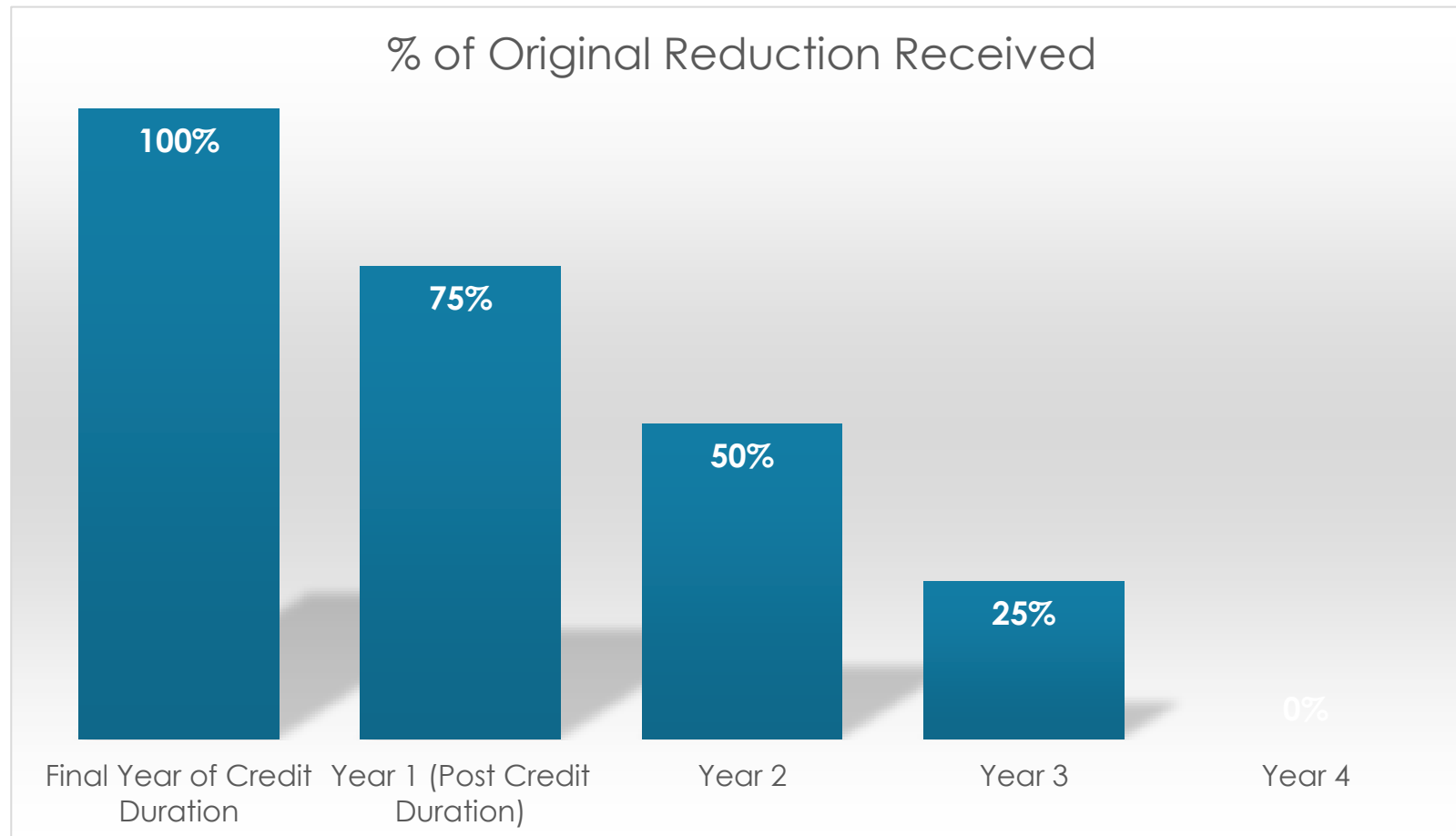
### Some possible applications:

- **Partial Credit Should be Applied Equally across all BMPs.**
  - Each BMP receives the same reduction from its original efficiency.
- **Different Partial Credit for different BMPs**
- **Only certain practices receive partial credit due to inability to locate and verify (ie. NRCS practices)**

# PROPOSALS

## THE GRADUAL PHASE OUT APPROACH

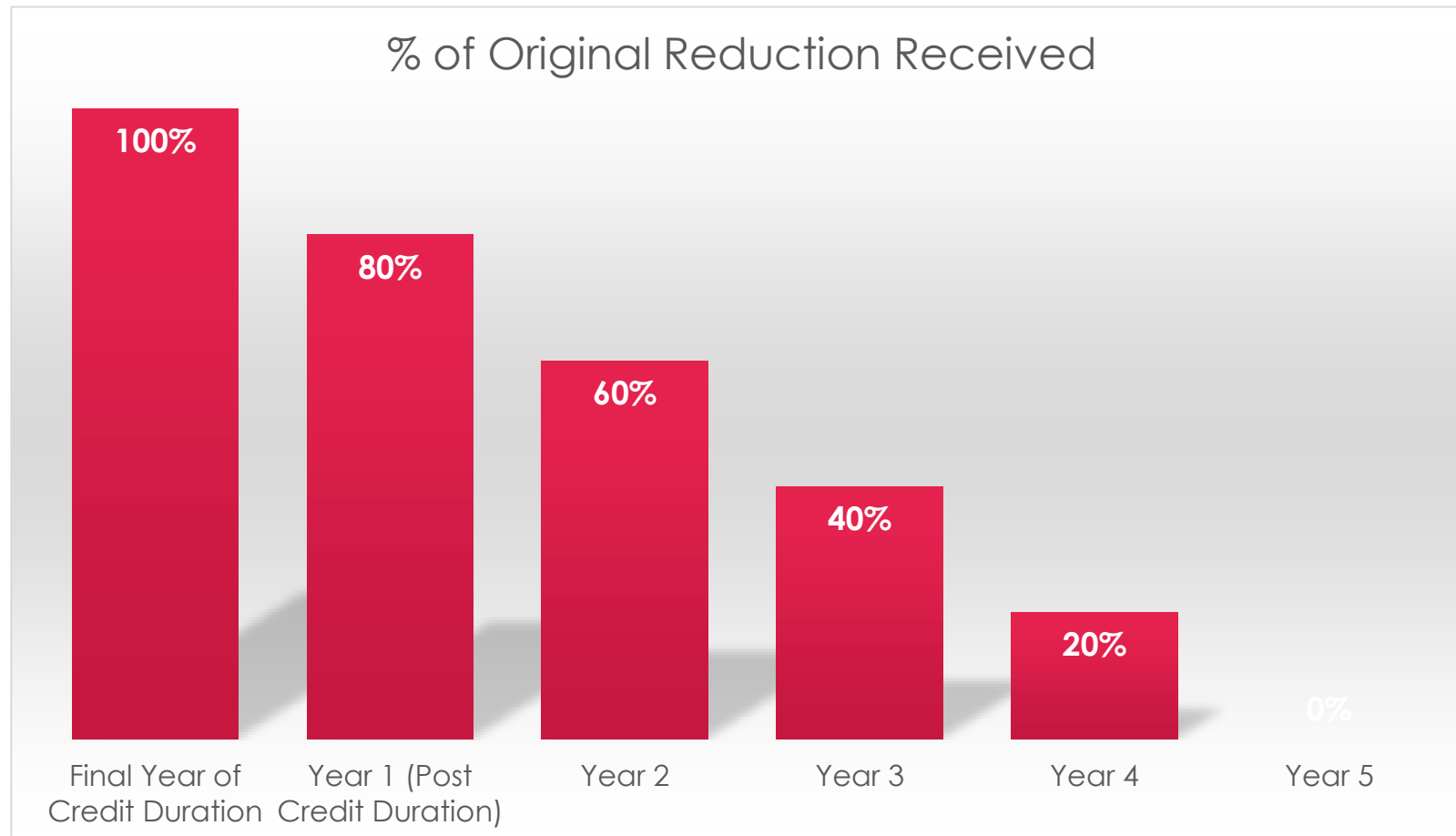
- **Ex.** Across the board number, like 25%, with full phase out of credit 4 years after credit duration expires.



# PROPOSALS

## THE GRADUAL PHASE OUT APPROACH

- **Ex.** Across the board number, like 20%, with full phase out after 5 years. **Partial credit should not exceed 5 years past credit duration expiration.**



## The modelling team requires the following to determine the amount of work to accomplish this task:

- Which BMPs would this apply to?
- Will only efficiency BMPs be affected or will land use change BMPs also be affected? If so, how will partial credit be applied to the amount of acreage attributed to the BMP?
- What is the method? (Ex. 20% downgrade over 5 years, static discount, “half-life”, etc.)
- How will this affect other CAST users and existing scenarios?
  
- In order to determine the amount of time this task will take; developers will need to work through the method to determine – **this will take time.**
  - **For example,** multiple BMP names for the same BMP may need to be created to allow for partial credit.

*\*\*If developed and approved, this will be a CAST-23 item, NOT a CAST-21 item.*

- **To consider:** **IF** the goal is to extend the time a practice is in the model, **then** the **credit duration infrastructure already exists.**
  - Infrastructure for partial credit does not currently exist.



- **Discussion Questions related to the Concept.**

- Where is it appropriate to make decisions based on science and where is it appropriate to decide based on policy or administrative challenges?
- Should Partial Credit only apply to certain BMPs, like NRCS related practices?
- Does partial credit diminish the purpose of the verification program, or does it alleviate the challenges of states not being able to verify practices that cannot be located?
- Where is the compromise for states that are having issues with verification? What is a better compromise than partial credit?
- Can extending credit durations achieve the same result as introducing partial credit?

- **Discussion Questions related to the Model.**

- How will this affect other CAST users?
- How will this effect existing scenarios?
- How long should a BMP exist in the model past its credit duration without being reinspected?
- How will a jurisdiction track BMPs that are receiving partial credit and develop plans for reinspection before the BMP phases out?

## Recap: Rationale from Jurisdictions that Support this Solution:

- **Maryland:** We believe partial credit should be extended to all BMPs but should not extend past a 5-year period.
- **District of Columbia:** Looking at the current limitations of BMP inspection from 1619 agreements, etc. and understanding BMPs do continue to operate past their credit life, we want to look at a step-down approach looking at BMPs makes sense. This could also help mitigate a BMP practice like trees where overcounting could be an issue
- **Virginia:** The verification program that we've established has swung too far. We should reevaluate our overall verification approach, which was to address the NRC report from May 2011.

## • Discussion Questions related to the Concept.

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- Does partial credit diminish the purpose of the verification program, or does it alleviate the challenges of states not being able to verify practices that cannot be located?
- Where is the compromise for states that are having issues with verification? What is a better compromise than partial credit?
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- **Discussion Questions related to the Model.**

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- Discussion Questions related to the Concept.

- Would Partial Credit be a viable option if it **only applied to NRCS/Federally Funded Practices that cannot be located?**
- For those who do not support Partial Credit, **what is the fundamental flaw of the proposal?**
- Outside of Partial Credit, what is **another solution to the problem** of the inability to perform verification due to a lack of point location data?

# Mentimeter

**Goal:** To determine if we should continue building on the Partial Credit Proposals as a group or move onto other tasks.



ANY ADDITIONAL COMMENTS?

